



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

February 3, 2010

Mr. Jeff Williams
Caledonia Correctional Institution
PO Box 137
Tillery, NC 27887

Re: Solid Waste Compost Permit SWC-42-06

Dear Mr. Williams:

Enclosed is your permit to operate a Small, Type 3 Solid Waste Compost Facility in Tillery, North Carolina. Please carefully read all permit conditions. Please note that permit conditions two and three list specific requirements for addressing stormwater and wastewater generation at the facility. These requirements were not listed in the previous permit. The operation manual submitted with your application has been incorporated into your permit. Your permit number is SWC-42-06. The permit expiration date is February 3, 2015.

Mrs. Mary Whaley, Environmental Senior Specialist, will be responsible for facility inspections. Mrs. Whaley can be contacted at 919-693-5023. If you have any questions please feel free to contact me at 919-508-8508.

Sincerely,

Michael E. Scott, Supervisor
Composting & Land Application Branch

cc: Mary Whaley, Environmental Senior Specialist, DWM
Ken Pickle, Permitting Engineer, DWQ
Central File, Solid Waste Section, Division of Waste Management

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1646 MAIL SERVICE CENTER
RALEIGH, N.C. 27699

Caledonia Correctional Institution

is hereby issued a permit to operate a

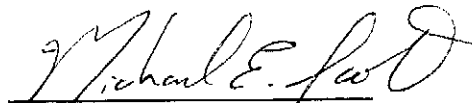
Small, TYPE 3 SOLID WASTE COMPOST FACILITY

on Caledonia Correctional Institution Property (NC DOC) in Halifax County

Permit Number: SWC-42-06

in accordance with Article 9, Chapter 130A, of the General Statutes of North Carolina and all rules promulgated thereunder and subject to the conditions set forth in this permit.

2/3/10
Date


Michael E. Scott, Branch Head
Solid Waste Section

Permit Conditions:

1. Operation and maintenance of this facility shall be in accordance with the Solid Waste Compost Rules (15A NCAC 13B, Section .1400), the Permit Application and the Operation and Maintenance Manual submitted with the permit application, and these permit conditions. Failure to comply may result in compliance actions or permit revocation by the Division of Waste Management.
2. This facility shall be operated in such a manner that erosion and runoff from the site shall be controlled. Any leachate generated at the facility and any runoff from the facility shall be managed in such a manner that ground or surface water quality will not be adversely affected. Leachate may not be land applied until specific approval is granted by the Division. The facility shall be maintained to prevent the accumulation of stormwater or leachate on travel or storage areas.
3. An appropriate Division of Water Quality permit for managing any stormwater or wastewater at the facility shall be obtained within six months of the issuance of this permit.
4. Only materials specifically listed in the permit application may be managed at this facility. Before additional materials may be added, there must be adequate testing and prior approval by the Division of Waste Management in writing.
5. All compost produced at the facility shall meet the requirements of Rule .1407 of the Solid Waste Compost Rules and the permit application.
6. Testing and reporting shall be conducted in accordance with the requirements of Rule .1408 and the permit application. An annual report of facility activities for the fiscal year July 1 to June 30 shall be submitted to the Division by August 1 of each year on forms provided by the Division. This report shall include the amount of materials composted in tons.
7. The compost operation and the compost pad shall be operated and maintained with sufficient dust control measures to minimize airborne emissions and to prevent dust from becoming a nuisance or safety hazard.
8. Compost process data shall be maintained in writing as required to document temperatures, moisture levels and aeration intervals.
9. The odor management plan shall be followed to minimize odors at the facility

boundary. Upon receipt of a facility complaint the facility operator shall investigate and take action as necessary to minimize the cause of the complaint. A copy of all complaints regarding this facility shall be maintained for two years including the operator's actions taken to resolve the complaints.

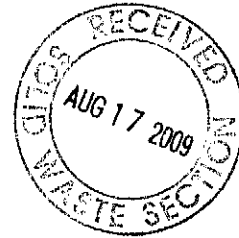
10. Feedstocks shall not be received that are in an anaerobic state.
11. The facility shall be operated in a manner that reduces the potential for vector attraction.
12. Stockpiling of finished product shall be limited to a height of 10'.
13. The facility operational capacity for this permit shall be limited to 4,000 cubic yards of feedstocks per year received for composting.
14. This permit shall expire on February 3, 2015. Changes in ownership, increase in facility capacity, or receiving feed stocks not identified in the permit application shall require a permit modification.



OFFICE MEMORANDUM

Caledonia Correctional Institution
PO Box 137
Tillery, North Carolina 27887

August 13, 2009



Mr. Michael Scott
NCDENR
Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699-1646


Re: Caledonia Correctional Institution
Small Type III Compost Facility – Permit number SW 42-06
Halifax County

To Whom It May Concern:

Please let this letter stand as a request for permit renewal for Caledonia Correctional Institution to operate a small Type III Compost Facility at Caledonia Correctional Institution property (NCDOC) in Halifax County.

Enclosed are the application requirements for Solid Waste Compost Facilities. Should you have any questions, please advise.

Sincerely


Jeff Williams, Supervisor
Caledonia Maintenance

cc: file

APPROVED

MES
2/3/10

Application Requirements For Solid Waste Compost Facilities

.1405(A) Caledonia Correctional Institution is requesting a permit renewal to operate a type three solid waste compost facility.

1. An areal photograph which is one inch is equal to 400 feet. See attached.
 - (a) All properties surrounding the proposed compost site are owned by the State of North Carolina, NC Department of Correction.
 - (b) There are no buildings public or private, utilities, public roads, or water courses or within three hundred feet of our proposed facility. A dry run is located approximately 150 feet behind the compost bins.
 - (c) No zoning requirement. (See letter attached)
2. A letter from Keith Dobbins (Zoning Officer) is attached stating that state property is not subject to any zoning laws within Halifax County. A letter from Mr. Dobbins is attached. Therefore, no zoning permit is required.
3. An explanation of how the site complies with sitting and designed standards in rule .1404 of this section.

- .1404(A)
1. The location of Caledonia's compost facility is not within the one hundred year floodplain, see attached letter.
 2. The nearest property line is in excess of 2500 feet from the compost facility.
 3. The nearest residence is a least 500 feet from the compost facility.
 4. The closed well is 4,000 feet away.
 5. There are no perennial streams/rivers within at least 300 feet of the facility. The Roanoke River is 7200 foot away.
 6. The Roanoke River is a Class C stream at this point and there are no restrictions on uses within its watershed.
 7. Our compost facility is not located in a closed out disposal area.
 8. Our facilities position exceeds the minimum distance that is required between compost areas and swales or berms that will allow for fire fighting equipment. The distance around our facility is at least 400 feet to any building.
 9. A site shall meet the following surface water requirement:

Our facility is an invessel system that is under roof and which collects all lechate from the compost bins in a 1,500 gallon tank located at the west end of the compost bins. The lechate will be added to the compost as a moisture source or if necessary sprayed on the adjacent fescue fields. Areas for spray irrigation have been approved by the Division of Waste Management staff. The area around the facility, including the areas for curing and storage is gently sloping, bermed where appropriate and is in fescue to control erosion and filter any runoff from the facility. Any feedstock spills will be immediately cleaned and placed in the compost bins.

As a result:

 - a. The site shall not cause a discharge of materials into waters or wetlands of the state.
 - b. The site will not cause a discharge of pollutants into waters of the state.
 - c. The site will not cause non-point source pollution of waters of the state.

10. A site shall meet the following ground water requirements:
- (a) Our facility is a invessel system which will collect and re-cycle all leachate and should not, there, contravene ground water standards.
 - (b) Soil texture at the site was evaluated by the Division of Waste Management and found to have a texture finer than loamy sand and the depth to seasonal wetness is in excess of 24 inches.
 - (c) Our facility will be a small type three facility.
 - (d) Curing may take place and finished product will be stored adjacent to the compost bins. The soil conditions are as described in #2 above. All stored material will pass the paint filter test.
 - (e) Our compost facility sets on a minimum of six inch foundation of cement. No natural soils or liners are used for active composting.

.1404(B) Alternative minimum buffers are not required by the Division of Waste Management.

.1404 (C) **A SITE SHALL MEET THE FOLLOWING DESIGN REQUIREMENTS:**

- 1. Our compost facility is in a location where there is controlled public access due to security measures for Caledonia Correctional Institution.
- 2. Less than one acre will be disturbed in the construction of this facility and the area down slope will be grassed or bermed to control and filter run-off. Our facility is an in-vessel system, which collects all leachate from compost and re-cycled to meet the needs of the composing.
- 3. Our facility being in an aerated in-vessel system should minimize odors. If necessary to control odors, the aeration can be reversed and a bio-filter installed to control odors.
- 4. Our compost site is in the middle of a 7500 acre farm, therefore, minimizing odors to any adjacent property owners.

.1405 #4 **A DETAILED REPORT INDICATING THE FOLLOWING:**

- (a) Caledonia's compost facility will utilize medium size wood chips, saw dust and/or peanut hulls as its primary bulking agent. The following other solid wastes may also be composted at the facility:

Dining hall food was and associated paper waste such as
Napkins and milk cartons
Kitchen waste
Food Processing waste from the Canery
Shredded paper
Socks and other 100% cotton clothing
Poultry mortality
Manure
Greenhouse waste
Cotton gin trash
Tobacco dust
Yard waste

The estimate quantity of the solid was should be less than 100 cubic yards per month. Similar waste may be received from other nearby Correctional facilities.

- (b) Caledonia's composting facility is set on a minimum of 6" thick concrete pad. Curing and any storage will be in an area of soils with textures finer than sandy loam and a depth to seasonal wetness in excess of 24 inches.

.1405 #5

Site Plan Attached

.1405 #6

A DESCRIPTION OF THE OPERATION OF THE FACILITY WHICH MUST INCLUDE AT A MINIMUM:

- (A) Jeffrey Williams, Facility Maintenance Supervisor IV, PO Box 137, Tillery, NC 27887, area code (252)826-5621.
- (B) Two to four honor grade inmates will be responsible for operation of the facility. One Enterprise Gate Officer will supervise this inmates.
- (C) This facility will operate seven days per week. The honor grades would work approximately 7:30 – 4:30 each day.

Dining hall and kitchen waste will be transported to the facility bi-weekly. Wastes will be screened for foreign matter as added to the bins. Putrescible wastes will be added to the bins the same day they are delivered to the facility. Wastes with any free water will be added directly to the bins. Temperatures will be monitored daily and recorded.

Waste will be layered into the bins and covered with bulking material.

Finished product will be moved to the adjacent curing and storage area with a loader as the bins are needed for the next batch of waste. The product will be used at the correctional institution.

More detail is provided in the operation and maintenance portion of the application.

Compost will be tested at least every 6 months for pathogens, regulated metals, and foreign matter.

.1405-#6

- (D) Heavy Winds – Heavy winds would not hinder our operation due to our solid waste being in bins and not on open ground. Heavy Rain would not hinder our composting ability due to (1) our facility being bins built on a pad, (2) all weather access to the area of the bins and (3) the bins are covered by a roof which will prevent excess water from entering the bins. Snow and freezing weather should not be a factor. Food waste will be stored near the kitchens during periods of heavy snow until they can be transported to the bins. No cured compost would be moved during snowy conditions.
- (E) Odors will be controlled through maintaining proper C:N ratios (20:1) in the bins and odors and vectors will also be controlled by covering layers of Putrescible wastes with layers of bulking material. A moisture source is available at the facility to control moisture which will control dust. Our composting facility to control moisture which will control dust. Our composting facility sets in the middle of a 7500 acre farm therefore minimizing noise and air borne particles

and odors to any surrounding neighbors. Noise will not significantly increase over that normally encountered with the operation of a 7500 acre farm.

.1405-6(F)

There are several choices from which Caledonia can utilize its cured composting material. They are as follows:

Using in conjunction with potting soil for day lilies.

Used as a fertilizer and potting media in conjunction with Caledonia's greenhouses.

A supplement fertilizer for all crops or a soil amendment for eroded crop land. In case our finished product could not be utilized by Caledonia other state agencies could utilize it as a type of potting soil or fertilizer.

.1405 #7

(A) Design capacity of the facility; less than 1,000 cubic yards a quarter.

(B) See attached

(C) Wastes will be placed in the bins in layers. Wastes will be added to the bins by pouring from plastic barrels or from a loader bucket. Layers will be 4 to 12 inches thick depending on the waste. Rakes and shovels will be used to level the layers of waste as they are added. Shredding will not be necessary of the feedstock to be used. Bulking material will be ground prior to receipt at the facility.

(D) Process duration will be 45 to 120 days depending on the curing requirements of the particular user at the institution.

(E) The temperature shall be monitored and taken at least once a day. Temperature readings will be taken at various depths and locations (side and middle) in each bin with a 3 or 4 foot compost thermometer. Moisture readings will be taken as dictated by low temperature readings. A shovel will be used to dig into the bins and moisture sampled using the hand method. A grab sample of the product will be taken at least every 6 months and sampled for fecal coliform. A sample will be taken from each bin as it is removed and composted, kept refrigerated and sent to a NCDA lab at least every 6 months.

(F) Temperature readings will assure that the temperature are maintained at least 131 degrees for 3 consecutive days to meet PFRP requirements and at least 113 degrees for 14 days to meet vector attraction reduction requirements. Finished product will be sampled at least every 6 months to be sure pathogens are reduced.

(G) Each compost bin is equipped with a air control system consisting of a fan, 4 inch PVC air lines, and bioplates in the bottom of the bins to distribute air evenly. Timers will be used to control when the fans will run. Run times will vary depending on the stage of the composting material. Fans will be capable of delivering at least 815 cubic feet of air per minute.

(H) Our facility sits on top of a hill and as a result water run on will not be a problem. Runoff will be controlled and filtered with grass buffers or berms down slope of the facility.

(I) A 1,500 gallon leachate tank is present and will collect all leachate drainage from our facility. The pad the bins sit on is sloped toward the middle of the bins and from one end to the other (east to west) to facilitate leachate collection and prevent any leachate from draining out of the bins onto the ground surface. Leachate will be managed by using it as a moisture source for the compost or if necessary it can be sprayed on adjacent fescue hay field.

.1405 #8 See attached operation and maintenance manual

9 Drawings attached

10 See attached operation and maintenance manual

#11 Drawings attached

Operation and Maintenance Manual for the Caledonia Correctional Facility Compost Operation

Food waste from the Caledonia Prison unit is transported bi-weekly to the compost facility from the dining hall. Any food waste from other nearby prison units is delivered at a scheduled time so that the appropriate inmates will be available to unload the waste. Food waste is delivered in barrels. Other wastes are delivered at various times of the day and are put in the waste storage area on the east side of the compost bins. Food wastes are added to the bins upon delivery.

A 6" inch layer of bulking material will be placed in the bottom of each bin prior to adding any wastes. This layer may be increased if necessary to help manage leachate. Inmates will layer these materials into the bins as the food waste is added. Rakes and shovels will be used to level the material that is added to the bins. Moisture, in the form of water or leachate, will be added to the bins with the wastes as necessary to attain a moisture level of 55 to 60 percent. This will be determined by compost temperatures, visual inspection and hand method. Separate hoses will be available to spray the water or leachate into the bins. Putrescible wastes will be added to the bins the same day as delivered to the facility.

Wastes will be placed in layers in the bins 3 to 6 inches thick. The thickness of the layers will be determined based on the moisture content, nitrogen content, and particle size of the wastes. Bulking material will be added on top of each layer of waste. The thickness of the bulking material layers will depend on the feedstock characteristics. As wastes and bulking materials are added boards are placed in the opening of the bin to prevent waste from falling out of the bins.

Incoming waste is checked for non compostable materials as the wastes are added to the bins. Non compostable wastes are placed in a trash can at the bins and later disposed of with other solid waste at the prison unit. Any wastes found at the facility that are not approved for composting will be removed and disposed of properly and the occurrence reported to the Prison Administrator.

Fans can be set to operate the amount of minutes per hour as the bins are filled, if needed. However, fans are not utilized at this time until there is a need to increase the temperature, then only 10-15 minutes, three to six times a week. Fan speeds are increased as necessary to assure the oxygen content in the bins does not get to low, if the temperatures in the bins rise above 160 degrees, or if the compost becomes to wet (wet is determined using the hand method-if water can be squeezed out of the compost it is too wet). Fan speeds are reduced when excessive heat loss is evident. An average temperature of 140-150 degrees is desirable.

Temperature readings are taken daily from at least two different locations in each bin at least two different depths. Temperatures must remain above 131 degrees for at least 3 days to meet pathogen reduction requirements. Temperatures must remain above 113 degrees for 14 days to meet vector attraction reduction requirements. Bin temperatures are recorded as they are taken in a log book. The book should indicate the date and bin number of each reading. If only one number is recorded for each bin it will be the lowest temperature recorded for that bin. Pathogen reduction requirements will be met after any leachate is added to the compost.

The temperature log and thermometer will be kept at the bins. A copy of the permit and permit application will be maintained at the Administration Office of the Prison Unit.

If temperatures are not maintained in a bin the contents of the bin must be examined to determine why the wastes are not composting. Moisture can be determined using the hand method. If water can be squeezed out of the compost it is too wet and aeration must be licensed or bulking material added. If the compost does not have moisture on the hand and will not hold together it is too dry and water or leachate must be added to increase moisture levels. If the compost holds together in a ball and leaves moisture on your hand it is about the right moisture level. The material in the bin may be too dense to get adequate air flow in which case the bins would need to be re-mixed and possibly course bulking material added.

Temperatures may also fail to rise if the air flow is too great. If the bin appears to contain too much carbon and not enough nitrogen then additional feedstock or a high nitrogen fertilizer will need to be mixed with the contents of the bin. If material needs to be added to a bin to regulate C:N ration or porosity the material may be removed from the bin with a loader and mixed in the receiving and bulking material storage area. Contents of bins that do not meet temperature requirements will be blended with fresh feedstock and re-blended.

In addition to temperature monitoring the following duties must be performed weekly:

1. All fans are checked to be sure they are operating properly.
2. The depth of leachate in the storage tank is checked.

In the event of a power failure, waste can be held near the dining halls until power is restored or if necessary the waste can be blended with bulking agent and windrowed in the waste receiving area and later placed in a bin. Feedstock spilled around the bins will be cleaned up with a rake and shovel and placed in a bin. In the event of a fire there is a water hose and fire extinguishers at the bins. If the fire cannot be controlled it will be reported immediately to the Prison Administrators Office.

Odors and vectors at the site will normally be controlled through proper composting methods. This includes maintaining adequate aeration, proper moisture levels, and maintaining a C:N ratio approximately 20:1. Our finished compost can be utilized in flowerbeds, and/or as bulking agent. If odors persist at the site the aeration system will be reversed and a biofilter constructed at the facility. Vectors should be controlled by covering the bins with bulking material and maintaining reasonable cleanliness around the bins. If flies cannot be controlled, chemical sprays will be used or parasites will be introduced in the area.

A sample for testing for metals and foreign matter will be collected from the compost in each bin as it is being removed. Fresh latex gloves are utilized in obtaining a sample from each compost bin as it is removed and placed in a Ziploc bag and labeled. These samples will be maintained in a cooler. At least every six months the compost will be tested for foreign matter by passing a weighed sample through a ¼ inch screen. Foreign matter that can be clearly identified shall be separated and weighed to determine the percent foreign matter.

A portion of the composite sample shall also be sent to a Waste Analysis Lab every 6 months and analyzed for all the information that the lab will provide. Specifically, cadmium, copper, lead, nickel, and Zinc must be included.

A grab sample will be taken at least every six months and tested for fecal coliform. The sample should be taken from inside a bin during the removal of the contents of the bin. A clean shovel or glove should be used to take the sample to avoid the possibility of contamination. The sample should be placed in a plastic bag and transported to an approved lab as soon as possible.

A berm is maintained between the bins and the adjacent road to keep run-off from leaving the site and entering the road. The berm is maintained in vegetation to prevent erosion. The areas down hill from the bins on the north and west sides are maintained in vegetation to prevent erosion and to filter and particulates that might move from the area around the bins. A designated portion of this area may also be used to spray leachate from the leachate storage tank if production should become too great to re-use the leachate as a moisture source. The areas around the facility will be checked monthly or after heavy rains for evidence of erosion or runoff. If any areas of erosion or runoff are noted they will be stabilized immediately with hay bales and graded and re-seeded as soon as moisture conditions permit.

Facility records will be kept to indicate the following:

.1408 (B) **Record Keeping:**

Caledonia has loaded our front-end loader with empty peanut hulls, wrapped in plastic and taped with duct tape and then weighed and then unloaded and weighed empty to procure the amount of peanut hulls or bulking agent that is being utilized in each bin. Also, several front-end loads of finished product have been wrapped, taped, weighed, loaded and unloaded to ascertain the finished product weight. Also, thirty-five gallon barrels of Kitchen waste have been weighed multiple times to ascertain the weight in which will be utilized in each bin as eight for this raw product. All weights have been measured and weighed in pounds and tabulated into tons (2,000lbs.=1 ton). When beginning a bin, the same recipe has been utilized. Two front-end loads of bulking agent is placed into the bottom of a bin and spread out followed by 6 barrels of Kitchen waste, followed by 2 front-end loads of bulking agent. This is completed for 4 times with 2 front-end loads of bulking agent on the top. Each scoop weighs 2 lbs each of fertilizer and bulking agent. By utilizing this format, the weight of each bin can be tabulated from pounds into tons, which will be utilized for the yearly report.

- (1) Daily operational records must be maintained, which include, at a minimum, temperature data (length of the composting period) and quantity of material processed;
- (2) Analytical results on compost testing;
- (3) The quantity, type and source of waste received;
- (4) The quantity and type of waste processed into compost;
- (5) The quantity and type of compost produced by product classification; and;

- (6) The quantity and type of compost removed for use or disposal, by product classification, and the market or permitted disposal facility.

.1408(C)

Annual Reporting:

- (1) The facility name, address, and permit number.
- (2) The total quantity in tons, with sludge values expressed in dry weight, and type of waste received at the facility during the year covered by the report, including tons of waste received from local governments of origin;
- (3) The total quantity in tons, with sludge values expressed in dry weight, and type of waste processed into compost during the year covered by the report;
- (4) The total quantity in tons and type of compost produced at the facility; by product classification, during the year covered by the report;
- (5) The total quantity in tons and type of compost removed for use or disposal from the facility, by product classification, along with a general description of the market if for use during the year covered by the report;
- (6) Monthly temperature monitoring to support Rule >1406 of this Section; and
- (7) Results of tests required in Table 3 of this Rule.

Page ____ of ____

COMPOST TEMPERATURE CHART

Start Date: _____ **Completion Date:** _____ **Compost Bin #** _____

[illegible]

Signature: _____ Date: _____ Time: _____

Scott, Michael

From: Pickle, Ken
Sent: Wednesday, January 27, 2010 9:18 AM
To: Scott, Michael
Cc: Smith, Danny; Georgoulas, Bethany; Bennett, Bradley
Subject: FW: Caledonia

Hi Michael,

Re: Caledonia State Prison Farm, Tillery, NC
DWM Composting permit renewal

It appears that Caledonia does not hold the proper DWQ permits for the surface discharges from the composting operation. However, reported site circumstances do not indicate an imminent water quality risk, but only the absence of a permit required by state and federal rules. While we consider discharging without a permit to be a serious infraction, our perspective is always informed by the specific physical impact observed at an unpermitted site. We are typically receptive to providing reasonable time frames for compliance.

In the reported circumstances at Caledonia, DWQ has no interest in asking DWM to delay or withhold the renewal of the composting permit, and given the reported site circumstances, we are satisfied for the moment with DWM's direction to your permittee to seek a No Exposure Exclusion from Permitting under the NPDES stormwater discharge permitting program. We defer to your judgment and your procedural preferences as to whether you provide this instruction to your permittee in a cover letter, or compliance schedule, or in your permit text, or other means. We suggest a rather short time clock for the permittee's submittal of the request for No Exposure status. I am requesting a courtesy copy of your instructions as delivered to your permittee.

We anticipate that the facility will acquire and deploy tarps to remove any exposure to incident rainfall, and that the facility will prevent run on from contacting the two piles. If necessary to prevent run on contact, we anticipate that the facility will modify the grading or paving under the two piles; or provide diversion and containment curbing, or other like minor measures to achieve no exposure to run on.

The facility can make application for the No Exposure Exclusion from Permitting directly to DWQ's Stormwater Permitting Unit in the Central Office in Raleigh. The No Exposure application form is posted on our website. The Stormwater Permitting Unit will copy DWQ's Raleigh Regional Office on the related correspondence.

While this note does not absolve the facility from past non-compliance with state and federal rules, it does indicate DWQ's willingness to defer enforcement action while the facility implements the minimal measures to qualify for, and apply for, the No Exposure Exclusion from Stormwater Permitting, and consequently to remove this cause of future non-compliance.

Ken

From: Smith, Danny
Sent: Tuesday, January 26, 2010 5:06 PM
To: Pickle, Ken
Subject: RE: Caledonia

Hey Ken,

I think your approach is fine. [Just a fyi: we have been having some difficulty with caledonia's wwtp plant and collection system compliance. They have trouble with maintenance and limit violations... Is there a way that they can inform us that the tarps are actually put in place (timely) and maintained? . We visit the site routinely so we can keep an eye on it.]

Thanks for heads up
danny

My email has changed to danny.smith@ncdenr.gov

***E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.*

From: Pickle, Ken
Sent: Tuesday, January 26, 2010 12:42 PM
To: Smith, Danny
Cc: Bennett, Bradley; Georgoulas, Bethany; Scott, Michael
Subject: FW: Caledonia

Re: Composting facility

Danny,

Caledonia State Prison Farm is in Halifax County, close to the county line with Northampton County; the closest towns are Boone's Crossroads and Tillery.

Drainage appears to be by UT south to the Conoconnara Swamp, Class C, and from there to the Roanoke River, Class C at the confluence.

The prison runs a very small food waste composting operation that has a DWM composting permit up for renewal. As DWM rules require, DWM has contacted DWQ to ascertain whether the proper DWQ permits are in place for this facility. (They aren't.)

In response to DWM's specific request to expedite this particular facility to the maximum, I'm proposing as follows:

I've seen pictures of the facility taken by DWM, and the composting operation appears to be inconsequential in size. DWM reports minimal stormwater exposure, and further that they can write up their DWM permit to require tarp covers over two small piles of finished compost and wood chips, thus removing exposure. The actual bin composting process takes place under a roof, maybe 20'x20'. I'd like to handle this expeditiously via two steps:

- a) If RRO SWPS is in agreement, I'd like to accept the photo evidence from Michael Scott, and skip any RRO/CO site visit to corroborate site conditions wrt stormwater exposure. I'd like to advise DWM that we are ok with them including tarps to cover the two piles in the DWM permit. I'll advise DWM to insert in the permit a very short time clock for the prison to acquire and deploy the two tarps.
- b) Further, I'd like to coordinate having the prison to follow up with a written request for the No Exposure Exclusion from stormwater permitting once the tarps are acquired and deployed. That submittal can be directed to me in the CO. If you want to take it into the RRO, that's fine with me, but I'm volunteering to do it in the CO.

Because of it's very small size, in my mind this facility falls into the category of: if there ever was a facility that we could safely afford to expedite our administrative procedures for without apparent environmental risk, this would be it. We have a couple of college dining hall composting operations under the No Exposure already in ARO. They essentially

agreed to deploy tarps in order to achieve no exposure, and to avoid more extensive DWQ permitting requirements. I'm happy with those outcomes in ARO. I'm unwilling to proceed with the above expedited process, however, without RRO concurrence at Caledonia.

How do you feel about this?

Ken

From: Scott, Michael
Sent: Friday, January 15, 2010 3:23 PM
To: Pickle, Ken
Subject: Caledonia

Ken,

Please let me know the status of any requirements for the Caledonia Composting facility we discussed on Thursday. Caledonia composts primarily food waste and wood chips in Tillery, NC. The facility is under roof but does store final product and wood chips in small piles outside of the roof area. The permit is for <100 cubic yards per month. The contact person is Jeffrey Williams 252-826-5621.

This is a small facility and I hope to sign the updated permit within the next two weeks.

Mike

Michael E. Scott, Branch Head
Composting and Land Application Branch
NC DENR-Division of Waste Management
1646 Mail Service Center Raleigh, NC 27699-1646
919-508-8508
919-733-4810 fax
michael.scott@ncdenr.gov

E-mail correspondence to and from this email address may be subject to the NC Public Records Law and disclosure to third parties.

Scott, Michael

From: Jeffery Williams [wjx02@doc.state.nc.us]
Sent: Wednesday, January 27, 2010 7:01 AM
To: Scott, Michael
Subject: RE: Compost Mods

10-4. I'll check with him on it.

'If we learn how to give of ourselves, to forgive others, and to live with thanksgiving, we need not seek happiness. It will seek us.'
unknown

Jeffrey Williams
Facility Maintenance Supervisor
Caledonia Correctional Inst.
Hwy 561
PO Box 137
Tillery, NC 27887
252.826.5621 ext 730

>>> "Scott, Michael" <michael.scott@ncdenr.gov> 1/25/2010 3:56 PM >>>
Jeffrey,

Thank you for the email. I believe Jamie said that he was also mailing us a letter that described the changes.

Mike

Michael E. Scott, Branch Head
Composting and Land Application Branch
NC DENR-Division of Waste Management
1646 Mail Service Center Raleigh, NC 27699-1646
919-508-8508
919-733-4810 fax
michael.scott@ncdenr.gov

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-----Original Message-----

From: Jeffery Williams [mailto:wjx02@doc.state.nc.us]
Sent: Friday, January 22, 2010 5:12 PM
To: michael.scott@ncmail.net
Subject: Compost Mods

Mr. Scott:

Jamie wanted me to pass on to you his proposed mods for our compost. He's going to shut down 3 bins. These are bins 1,11 and 12. He plans to put the screener in bin 12. Bin 1 will

received the heavy/trash from the processing which will be re-composted while bin 11 will receive the finished product. I hope this helps. Have a good weekend.

'If we learn how to give of ourselves, to forgive others,
and to live with thanksgiving, we need not seek
happiness. It will seek us.'
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